



MIRANDA SLONE SKLARIN VERVENIOTIS LLP

MICHAEL A. MIRANDA*
STEVEN VERVENIOTIS
ONDINE SLONE
RICHARD S. SKLARIN^o
MAURIZIO SAVOJARDO
KELLY M. ZIC
ANDREW B. KAUFMAN[±]
LAWRENCE S. WASSERMAN

THE ESPOSITO BUILDING
240 MINEOLA BOULEVARD
MINEOLA, NY 11501
TEL (516) 741-7676
FAX (516) 741-9060

WWW.MSSSV.COM

BRANCH OFFICES:
WESTCHESTER, NY
NEW YORK, NY
CLARK, NJ

ANNE P. EDELMAN
GABRIELLA CAMPIGLIA
RICHARD B. EPSTEIN
ABRAHAM WARMBRAND
LAURA ALTO
CHRISTOPHER J. LAMPERT*
AMELIA DWECK
BRANDON H. DORMAN
KEVIN W. MURRAY
JAMES KIMMEL^o

SENIOR COUNSEL
LOUISE FASANO
NANCY R. SCHEMBRI^o

WRITER'S DIRECT DIAL:
516-741-8488

WRITER'S E-MAIL:
SVVERVENIOTIS@MSSSV.COM

*ALSO ADMITTED IN NEW JERSEY
oALSO ADMITTED IN FLORIDA
±ALSO ADMITTED IN DISTRICT OF COLUMBIA
o RESIDENT IN WESTCHESTER

May 5, 2022

Hon. Elizabeth A. Wolford
Chief United States District Judge
Kenneth B. Keating Federal Building
100 State Street
Rochester, New York 14614

RECEIVED
ELIZABETH A. WOLFORD

MAY 09 2022

Chief Judge
United States District Court
Western District of New York

Re: *Penn-Star Ins. Co. v. FPM Realty LLC et al.*
Case No.: 6:22-cv-06169-EAW

Dear Judge Wolford

I represent the plaintiff, Penn-Star Insurance Company ("Penn Star"), and I write to Your Honor. Further to my prior email to the Court, to explain that I am in the process of being admitted, having submitted to the Clerk of the Court the paperwork on the basis that I am admitted in the EDNY in good standing, and to request, with the consent of all parties who have appeared in this action (note that Rosewood, Fros and LME have defaulted and we have held off on a motion with permission of the EDNY), an extension of 30 days to respond to the April 25, 2022 Order to Show Cause as to the Court's diversity jurisdiction. I ask for the extension in order to be admitted before filing the documents requested as well as to work with counsel to confirm diversity jurisdiction. I have already asked counsel who have appeared to consult with their client as to their citizenship in order to confirm diversity jurisdiction or identify any dispute in that respect, and I also re-confirming my research from prior to filing the action in the EDNY as to the basis for diversity jurisdiction in order to comply with Your Honor's directive.

Respectfully Submitted,
MIRANDA SLONE SKLARIN VERVENIOTIS LLP

Steven Verveniotis